EXHIBIT 169

REDACTED

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Page 1

 1   IN THE UNITED STATES DISTRICT COURT
          FOR THE EASTERN DISTRICT OF TEXAS
 2   SHERMAN DIVISION
 3   THE STATE OF TEXAS, et   )
     al.,   )
 4   ) Case No.
                  Plaintiffs,   ) 4:20-cv-00957-SDJ
 5   )
     vs.   ) Hon. Sean D. Jordan
 6   )
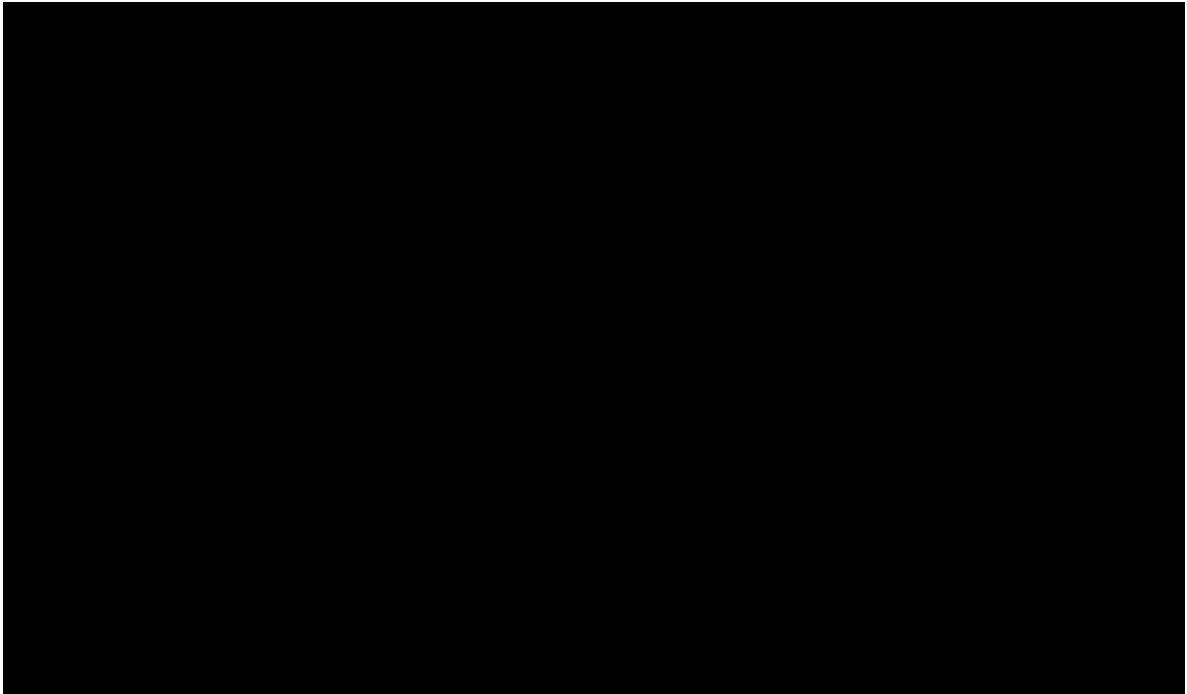   GOOGLE LLC,   )
 7   )
                  Defendant.   )
 8
                 FRIDAY, MAY 24, 2024
 9
     HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE
10   ORDER
                        - - -
11
12   Videotaped deposition of Neal
13   Mohan, in his personal capacity and 30(b)(6)
14   designee of Google LLC, held at the offices
15   of Freshfields Bruckhaus Deringer, 855 Main
16   Street, Redwood City, California, commencing
17   at 9:35 a.m. Pacific Time, on the above date,
18   before Carrie A. Campbell, Registered
19   Diplomate Reporter, Certified Realtime
20   Reporter, Illinois, California & Texas
21   Certified Shorthand Reporter, Missouri,
22   Kansas, Louisiana & New Jersey Certified
23   Court Reporter.
24   - - -
25   Job No. MDLG6687875

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(lines 1–10 redacted)

11   Now, cookies, again, is that

12   all-important technology.

13   All right? Right?

14   MS. SESSIONS: Object to the

15   form.

16   THE WITNESS: Are you asking do

17   I see that sentence?

18   QUESTIONS BY MR. LANIER:

19   Q.   Yeah.

20   That -- with this cookies,

21   that's reference to what you and I were

22   talking about earlier as a type of technology

23   important to the Internet?

24   A.   It is a type of technology

25   important to the Internet, yes.

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1   Q.   It stores information of

2   websites visited or what?

3   A.   It stores information that

4   websites need -- use to operate. So, for

5   example, if you go to a banking website and

6   you type in your -- you know, your username,

7   to make sure that you can actually then

8   transact on that website, sometimes cookie

9   technology is used by websites.

10   So it has a number of different

11   purposes that really lead to the functioning

12   of the Internet. It's like kind of a

13   technology that -- that's used across the

14   web.

15   Q.   But some cookies will show

16   where you've gone. They track people and how

17   people behave on the web.

18   Right?

19   A.   They don't track people. They

20   track -- a cookie is like an anonymous ID.

21   It's not tied to a person.

22   Q.   Tied to a computer, to an IP

23   address?

24   A.   No, not necessarily --

25   Q.   It can be.

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1   A.   -- tied to an IP address.

2   It could be, but it's not tied

3   to -- not necessarily.

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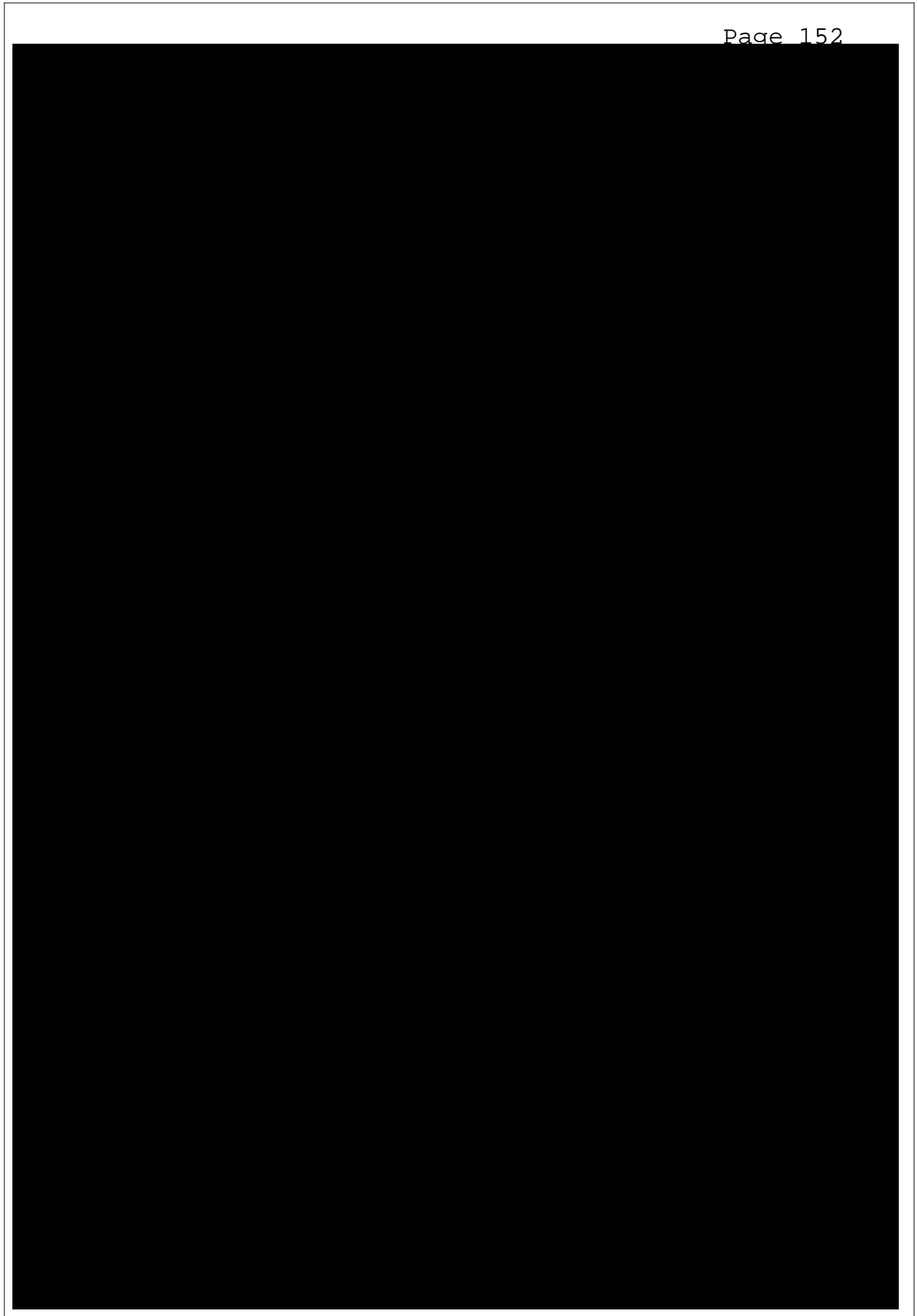Page 154

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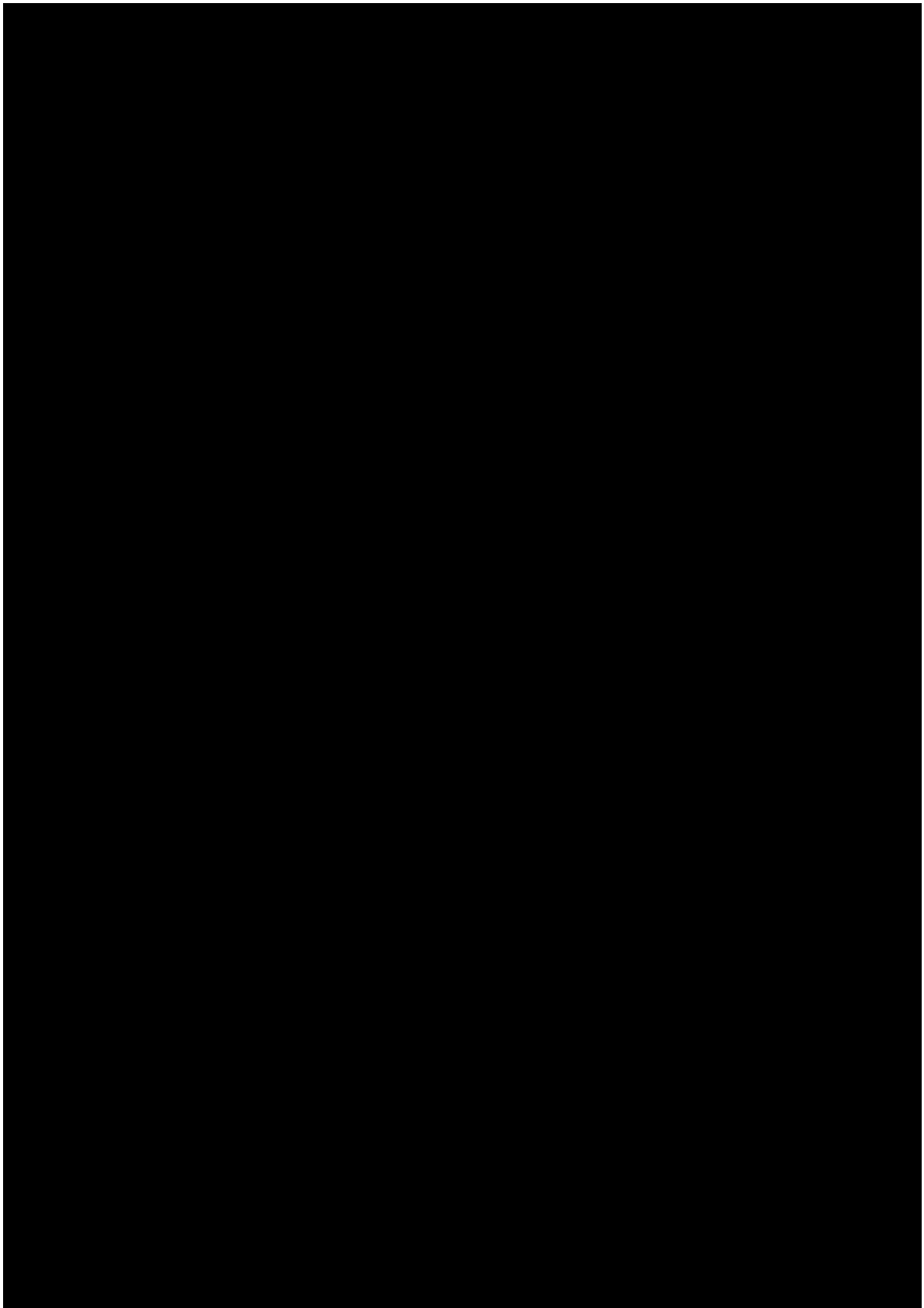
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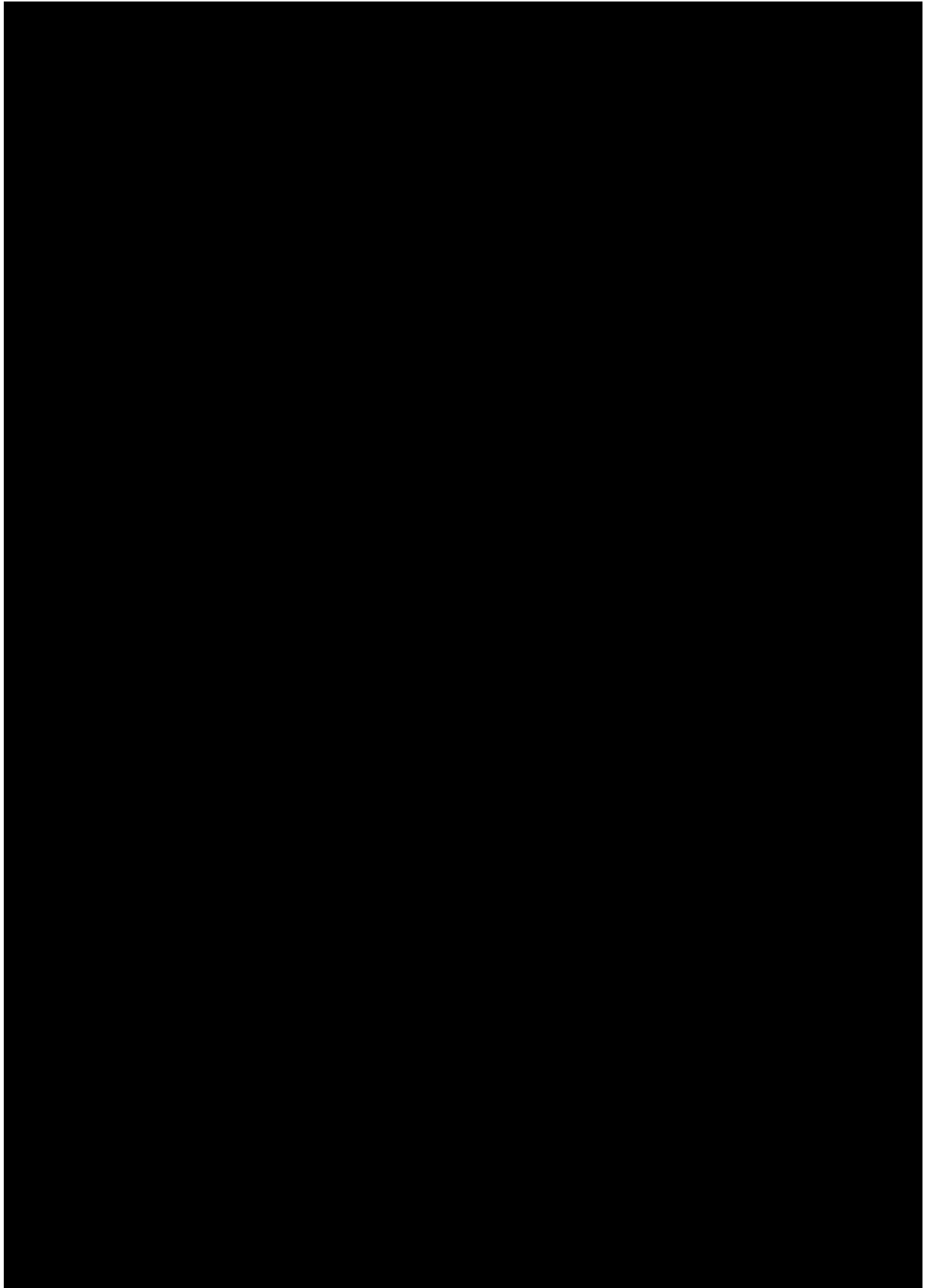
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1   THE WITNESS: Again, I'm not

2   sure it's tied to a device.

3   QUESTIONS BY MR. LANIER:

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17   QUESTIONS BY MR. LANIER:

18   Q.   But the point is, is you're

19   able to use cookie IDs to follow. If I -- if

20   I go look at a website for new cars, what are

21   the -- I google: What are the great new cars

22   that are out in 2025? And I get a website,

23   and I go to the website.

24   A copy of that is kept. The

25   note is kept that this computer has just gone

ERRATA SHEET FOR THE TRANSCRIPT OF NEAL MOHAN

Case Name: The State of Texas, et al. v. Google, LLC, No. 4:20-CV-957-SDJ

Dep. Date: May 24, 2024

Deponent: Neal Mohan

Page	Line	Corrections	Reason for Correction
11	20	The phrase "It wasn't necessary–" should read "It wasn't necess–"	Transcription error
17	4	The phrase "I worked on products" should read "I worked on projects"	Transcription error
56	12	The phrase "our clients based their" should read "our clients may base their"	Transcription error
132	24	The phrase "what I remember is" should read "what I remember as"	Transcription error
139	22	The phrase "ad network" should read "ad networks"	Transcription error
150	12	The phrase "It's like kind of a" should read "It's like kind of the"	Transcription error
164	11-12	The phrase "Or I guess it's not even an email" should read "Or I guess it's not even an email. It's a document or –"	Transcription error
192	7	The phrase "sure I'm looking at" should read "sure what I'm looking at"	Transcription error
201	17	The phrase "multiple experts" should read "multiple competitors"	Transcription error
206	19	The phrase "I'm happy to–" should read "I'm happy to repeat it–"	Transcription error
212	25	The phrase "not following your question." should read "not following your question. I'm–"	Transcription error
220	3	The phrase "sorry to step you" should read "sorry to step over you"	Transcription error
239	6	The phrase "And it's got about" should read "And it's got the"	Transcription error
257	2	The phrase "clear conscious" should read "clear conscience"	Typographical error
264	15-16	The phrase "I was the products chief" should read "I was the product chief"	Transcription error
272	15	The phrase "Form" should read "Object to the form"	Transcription error

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefore.

Date: 6/25/24   Signature: _____